

# Appendix J

## *Guidelines for Environmental Documents*

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### Environmental Documents

Use of the outlines in this appendix will allow Plant Health Directors in Plant Protection and Quarantine (PPQ) to comply quickly and easily with the National Environmental Policy Act of 1969 (NEPA).

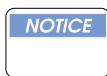
Outlines for two environmental documents, which are commonly developed to initiate a gypsy moth eradication program, are presented:

- ◆ Environmental Assessment (EA)
- ◆ Finding of No Significant Impact (FONSI)

A third environmental document, a Record of Decision (ROD), is occasionally done to record a decision; however, the ROD is **not** a required document.

If you have any questions concerning this appendix and compliance with NEPA and/or other statutes, contact:

Environmental Analysis and Documentation  
Policy and Program Development  
USDA-APHIS-PPD-EAD Unit 149  
4700 River Road  
Riverdale, Maryland 20737  
301-734-8565



Prior to decision-making, submit all Environmental Assessments (EAs) to Environmental Analysis and Documentation for review. The review will assure compliance with environmental laws.

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## Environmental Assessment (EA)

The EA should be tiered (that is, referenced) to the detailed Final Environmental Impact Statement (FEIS) on the gypsy moth, so that the EA is a concise public document. The EA will briefly discuss (a) the purpose and need for the action, (b) the public's involvement with the issue, (c) the affected environment, (d) alternatives considered, (e) environmental consequences, (f) monitoring, and (g) summary. The EA will also contain agencies and persons consulted, preparers, references, and appendixes. The site-specific EA should be as concise as possible, but still contain all the information necessary for the Responsible Official to make an informed decision.

A *suggested* table of contents for an EA follows on [page J-2](#).

Information on completing the entire EA is on [page J-4](#).

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## Suggested Table of Contents for an EA

|   |      |
|---|------|
| I. PURPOSE AND NEED FOR ACTION (5 pages)                | Page |
| A. Decisions to be Made (1 ¼ page)                      | 1    |
| 1. Introduction (¼ page)                                | 1    |
| 2. Need for Action (¼ page)                             | 1    |
| 3. Environmental Analysis and Documentation (½ page)    | 1    |
| 4. Decision to be Made (¼ page)                         | 2    |
| B. Proposed Action (¼ page)                             | 2    |
| C. Need for the Proposed Action (1 ½ pages)             | 2    |
| 1. Economic, Social, and Ecological Impacts (1 ¼ pages) | 2    |
| 2. Project Goals and Objectives (¼ page)                | 3    |
| D. Authorizing Laws (and/or Policies) (1 pages)         | 4    |
| 1. State Authorizing Laws (½ page)                      | 4    |
| 2. Federal Authorizing Laws (½ page)                    | 4    |
| E. Environmental Laws (1 page)                          | 5    |

|  |    |
|--|----|
| II. PUBLIC INVOLVEMENT AND ISSUES (SCOPING) (1 page)                                 | 6  |
| A. Public Involvement (½ page)   | 6  |
| B. Issues (½ page)   | 6  |
| III. AFFECTED ENVIRONMENT (1 page)   | 7  |
| A. Site Description(s) (¼ page)  | 7  |
| B. Environmental Factors and Threatened,<br>Endangered, & Sensitive Species (¼ page) | 7  |
| C. Environmental Factors and Humans (½ page)   | 7  |
| IV. ALTERNATIVES (1 page)  | 8  |
| A. Alternatives (¼ page)   | 8  |
| B. Alternatives Not Considered (¼ page)  | 8  |
| C. Alternatives Considered (¼ page)  | 8  |
| D. Preferred Alternative (¼ page)  | 8  |
| V. ENVIRONMENTAL CONSEQUENCES (1 page)   | 9  |
| A. Human Health and Safety (½ page)  | 9  |
| B. Non-target Organisms (½ page)   | 9  |
| C. Cumulative Effects (¼ page)   | 10 |
| D. Mitigation (½ page)   | 10 |
| VI. MONITORING (½ page)  | 11 |
| VII. SUMMARY (2 pages)   | 11 |

|   |    |
|---|----|
| VIII. LIST OF AGENCIES AND PERSONS CONSULTED (1 page) | 14 |
| IX. LIST OF PREPARERS (1 page)                        | 15 |
| X. APPENDIXES   | 16 |
| A. References   |    |
| B. Treatment Site Maps                                |    |
| C. Product Labels and Material Safety Data Sheets     |    |
| D. Letters to/from Federal and/or State Agencies      |    |
| E. Public Meeting Notifications                       |    |
| F. Other Appropriate Documents                        |    |

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## Completing the EA

### Title Page

The title page should contain the following information:

- ◆ Environmental Assessment (EA) Title
- ◆ Treatment Location(s)
- ◆ Agencies Involved (lead agency first)
- ◆ Date

### Table of Contents

In the table of contents, list major sections and, if desired, subsections; include page numbers. See [page J-2](#) for a suggested outline.

### I. Purpose and Need for Action

#### A. Decisions to be Made

1. Introduction. Briefly discuss the history of gypsy moth (GM) infestation(s) in area or State. Then briefly supply basic background information on the gypsy moth: the gypsy moth is not native, the need to protect US forests and trees, and the

gypsy moth life cycle and its effects. This basic information is in the Final Environmental Impact Statement (FEIS) on page 1-4 to page 1-9.

2. Need for Action. Briefly but fully discuss the need for action. Reasons for action should include such things as: the value of the host plants, the loss to any affected industries, the effect on human health if established, the effect on environmental quality if established, and any other site-specific reasons.

3. Environmental Analysis and Documentation. Briefly describe the gypsy moth FEIS and Risk Assessments which analyze possible actions in detail.

Discuss “tiering,” the referencing of environmental documents. Discuss how this EA is an extension, at the site-specific level, of previous environmental documents, such as the gypsy moth FEIS.

Mention that various management alternatives (which will be discussed in the “Alternatives” section) were analyzed in the gypsy moth FEIS and that a preferred alternative was designated.

#### B. Proposed Action

Mention that the Proposed Action for gypsy moth is eradication when an infestation is isolated. The response to a GM infestation is dictated by the site’s location within the United States, *i.e. geography*.

#### C. Need for Proposed Action

1. Economic, Social, and Ecological Impacts. Briefly discuss the likely economic, social, and ecological impacts if the GM infestation is allowed to persist and expand.

2. Goals and Objectives. Briefly describe the goals and objectives of the Proposed Action.

#### D. Authorizing Laws and Policies

1. State Authorizing Laws (and Policies). List only those laws (and policies, if they exist) that apply to this site-specific situation.

2. Federal Authorizing Laws. Through several Federal laws, the USDA has broad discretionary, statutory authority to conduct gypsy moth management activities. List and briefly describe each. No more than one sentence for each. Examples of the laws are on the following page.

The *Cooperative Forestry Assistance Act of 1978* provides the authority for the USDA and State cooperation in management of forest insects and diseases, allowing USDA-APHIS and USDA-FS to work together in gypsy moth eradication projects.

The *Federal Plant Pest Act of 1957* provides authority for APHIS to regulate the movement or dissemination of plant pests.

#### E. Environmental Laws and this Analysis

List and briefly describe only those laws that apply to the site-specific EA.

- a. National Environmental Policy Act (NEPA)
- b. Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA)
- c. National Forest Management Act
- d. Endangered Species Act (ESA)
- e. National Historic Preservation Act
- f. Executive Orders, including Environmental Justice
- g. Applicable State Laws
- h. Other Laws as applicable

## II. Public Involvement and Issues (Scoping)

#### A. Public Involvement

List public meetings and/or notifications.

#### B. Issues

Briefly describe issues raised or previously known.

The gypsy moth FEIS addresses three principal issues.

1. Effect of GM Presence. How does the presence of gypsy moth affect people and the environment?
2. Effect of Insecticidal Treatments. How do insecticidal treatments affect people and the environment?
3. Effects of Non-insecticidal Treatments. How do non-insecticidal treatments affect people and the environment?

An excellent resource for conducting public notification and involvement is found in the gypsy moth FEIS, Appendix C-Public Involvement and Issues.

### III. Affected Environment

Briefly described the site-specific environment based on the terminology of the gypsy moth FEIS:

#### A. Site Description(s)

Briefly describe the following: physical location, vegetation (forests, other areas with trees), water present and water quality, microclimate, soils, and nontarget organisms

#### B. Environmental Factors: Threatened, Endangered, and Sensitive Species.

Briefly discuss (1) any nontarget species affected and (2) any threatened, endangered, or sensitive species if in the area.

#### C. Environmental Factors: Human Factors.

Briefly discuss human health and safety, and social and economic factors.

Describe only those Environmental Factors that apply to the site-specific environment.

### IV. Alternatives



The Alternatives of a Site-Specific Environmental Assessment are the **treatment options** from the gypsy moth FEIS.

#### A. Alternatives

List alternatives available in the gypsy moth FEIS.

## B. Alternatives Not Considered

List the alternatives not considered and briefly say why.

## C. Alternatives Considered

List the alternatives considered and briefly state why.

## D. Preferred Alternative(s)

Discuss the preferred alternative with its treatments:

- a. *Bacillus thuringiensis* var. *kurstaki* (Btk)
- b. Diflubenzuron
- c. GypChek®
- d. Mass trapping
- e. Mating disruption
- f. Sterile release

Include information on the application rate, number of applications, etc.

## V. Environmental Consequences

On a site-specific basis this section should be developed directly (point-by-point) from the “Affected Environment” section and from the treatments for the preferred alternative.

The required human health and environmental consequences information can be found in Chapter 4 of the gypsy moth FEIS and in the Risk Assessments (Appendixes G & F).

For example, incorporation of Table 9-4 or Figure 9-1 from Appendix F would simplify your work; they clearly and concisely show human risks.

The Environmental Consequences Section should include another subsection on mitigation (including elements of Standard Operating Procedures).

## VI. Monitoring

Briefly discuss the monitoring program (dye cards, and so forth) that will determine the effects of treatments on the environment.



- VII. Summary** Summarize the consequences of the preferred action alternative with its treatments examined in detail. The summary may be in a tabular format. This summary is in essence the Finding of No Significant Impact (FONSI), which is discussed below.
- VIII. List of Agencies and Persons Consulted** List the agencies and persons consulted.
- IX. List of Preparers** List the preparers of the EA, including the APHIS State Plant Health Director, the representative of the State department of agriculture, and other cooperators.
- X. Appendixes** The appendixes could contain the following:
- ◆ References
  - ◆ Treatment area maps
  - ◆ Product labels and material safety data sheets (MSDSs)
  - ◆ Letters to/from Federal and/or State agencies or the public
  - ◆ Public meeting notifications
  - ◆ Other appropriate documents

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## Finding of No Significant Impact (FONSI)

A FONSI, prepared by a Federal agency, briefly presents the reasons why an action will not have a significant effect. The FONSI will refer to the EA and the FEIS by “tiering.” Tiering is the term for incorporating by reference more detailed environmental documents, such as the gypsy moth FEIS. On standard-sized paper the FONSI will be two pages.

To develop a FONSI for a gypsy moth eradication program, use the FONSI outline on [page J-10](#). This outline is only a *suggested* outline for a FONSI.

Replace only the text in **Bold-Type** with site-specific information. The regular-type text should **not** be replaced without the prior approval of Environmental Analysis and Documentation, as this text satisfies requirements of various Federal statutes and regulations.

A completed FONSI is on [page J-13](#).

## **FINDING OF NO SIGNIFICANT IMPACT**

(for)

[EXACT LOCATION BY COUNTY, STATE OR  
CITY, SPEC. LOCATION(S), AS APPLICABLE]

**[YEAR]** APHIS Cooperative Gypsy Moth Eradication Program

Site-Specific Environmental Assessment

### **[Briefly describe the need for action from the EA].**

Under the process described in the National Environmental Policy Act, 1969 (NEPA), this EA was prepared to analyze the effect of the proposed action at the site-specific level. The environmental consequences of this program are analyzed in this EA, which is supported by and tiered to the *Gypsy Moth Management in the United States: a Cooperative Approach, Final Environmental Impact Statement, November 1995* (FEIS). The Animal and Plant Health Inspection Service (APHIS) examined the six alternatives available in the FEIS. APHIS supports Alternative 6 (suppression, eradication, and slow-the-spread); however, by a Record of Decision (ROD), APHIS will only participate in eradication efforts. Under Alternative 6, several treatment options are available for gypsy moth eradication efforts. The treatments analyzed that may be used in an eradication effort are the following: 1) *Bacillus thuringiensis* var. *kurstaki* (Btk), a biological insecticide; 2) diflubenzuron, a chemical insecticide; 3) gypsy moth nucleopolyhedrosis virus (NPV) or GypChek®, a biological insecticide; 4) mass trapping, gypsy moth traps with disparlure to attract male gypsy moths; 5) mating disruption, aerial application of disparlure; and 6) sterile insect release, release of sterile or partially-sterile gypsy moth life stages. The potential environmental impacts and mitigation measures of these treatments are described in the FEIS and EA.

The EA was prepared by the **[STATE AND SPECIFIC AGENCY, IF APPLICABLE]** and USDA-APHIS. The FEIS and EA are available for review at:

USDA-APHIS-PPQ **[LOCAL OFFICE]**  
**[FULL BUILDING, STREET ADDRESS]**  
**[CITY, STATE, ZIP]**  
**[TELEPHONE #, IF APPROPRIATE]**

**[STATE AGENCY, DIVISION]**  
**[FULL BUILDING, STREET ADDRESS]**  
**[CITY, STATE, ZIP]**  
**[TELEPHONE #, IF APPROPRIATE]**

USDA-APHIS- PPQ  
PPQ Information Center, 1st floor  
4700 River Road  
Riverdale, MD 20737

(Usually page 2 starts here)

Under Alternative 6, a cooperative USDA-APHIS-**[STATE]** eradication project is proposed. This cooperative program selected the treatment options of **[FROM THE EA, I.E. BTK AND MASS TRAPPING]** (\*Note: by law APHIS can only conduct eradication programs\*). This eradication program will apply **[STATE THE AMOUNT OF INSECTICIDE AND THE NUMBER OF TREATMENTS TO BE USED, # OF AND TYPE OF TRAPS, ETC. THIS DETAILED PART WOULD COME DIRECTLY FROM THE EA]**, as detailed in the EA. Implementation of this program, with associated operating procedures and mitigation measures as identified in the EA, will ensure that no significant adverse environmental impacts will occur to the human environment.

Reasons for the Finding of No Significant Impact include:

[INSERT INFORMATION FROM EA SUMMARY TABLE IN TEXT FORM HERE. ALSO INCLUDE ANY OTHER REASONS MENTIONED IN THE EA, SUCH AS E&T SPECIES ARE NOT AFFECTED BECAUSE THERE ARE NONE IN TREATMENT AREA(S) OR THE PUBLIC WILL NOT BE IN TREATMENT AREA(S), ETC.]

This EA is consistent with Executive Order No. 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low-income Populations." The implementation of this cooperative USDA-APHIS, **[STATE OR DIVISION NAME]** eradication project will not result in disproportionately high and adverse human health or environmental effects on any minority populations and low-income populations. As required by the Executive Order of the President, opportunities for full participation in the NEPA process by such populations have been provided.

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**[AUTHORIZING FED. OFF. NAME]**

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Date

[TITLE]

[UNIT OR DIVISION]

## **FINDING OF NO SIGNIFICANT IMPACT**

(for)

Thirteen Listed Counties in Wisconsin

[1997] APHIS Cooperative Gypsy Moth Eradication Program

### **Site-Specific Environmental Assessment**

The gypsy moth, *Lymantria dispar*, is an exotic plant pest, a plant pest not native to Wisconsin. As an exotic plant pest of known destructiveness, gypsy moth has the potential to damage and/or destroy by defoliation many plant species in the State of Wisconsin.

There are no isolated infestations of gypsy moth in Wisconsin. If these isolated infestations are not eradicated, gypsy moth could become established in Wisconsin. Once established Federal and State agencies would impose quarantine restrictions on the movement of plant products and other articles. Also, the gypsy moth would cause adverse environmental effects by its damage.

Under the process described in the National Environmental Policy Act, 1969 (NEPA), this EA was prepared to analyze the effect of the proposed action at the site-specific level. The environmental consequences of this program are analyzed in this EA, which is supported by and tiered to the *Gypsy Moth Management in the United States: a Cooperative Approach, Final Environmental Impact Statement, November 1995* (FEIS). The Animal and Plant Health Inspection Service (APHIS) examined the six alternatives available in the FEIS. APHIS supports Alternative 6 (suppression, eradication, and slow-the-spread); however, APHIS will only participate in eradication efforts. Under Alternative 6, several treatment options are available for gypsy moth eradication. The treatments analyzed that may be used in an eradication effort are 1) *Bacillus thuringiensis* var. *kurstaki* (Btk), a biological insecticide; 2) diflubenzuron, a chemical insecticide; 4) gypsy moth nucleopolyhedrosis virus (NPV) or GypChek®, a biological insecticide; 5) mass trapping, gypsy moth traps with disparlure to attract male gypsy moths; 6) mating disruption, aerial application of disparlure; and 7) sterile insect release, release of sterile or partially-sterile gypsy moth life stages. The potential environmental impacts and mitigation measures of these treatments are described in the FEIS and EA.

The EA was prepared by the USDA-APHIS, USDA-FS, and Wisconsin Department of Agriculture, Trade and Consumer Protection (DATCP). The FEIS and EA are available for review at:

USDA, APHIS, PPQ  
1 Gifford Pinchot Drive  
Building 1, Room 204  
Madison, WI 53705

Administrator,  
Division of Agriculture Resource Management Wisconsin DATCP  
2811 Agriculture Drive  
Madison, WI 53708

USDA, APHIS, PPQ  
PPQ Information Center, 1st floor  
4700 River Road  
Riverdale, MD 20737

Under Alternative 6, a cooperative USDA-APHIS, USDA-FS, and DATCP eradication project is proposed. This cooperative program selected the treatment options of *Btk* at four sites. This eradication program will apply *Btk* (neat) at the rate of 36 billion international units per acre per application. Implementation of this program, with associated operating procedures and mitigation measures as identified in the EA, will ensure that no significant adverse environmental impacts will occur to the human environment.

Reasons for the finding of no significant impact include the following:

- 1) Human health risk from *Btk* is minor
- 2) *Btk* may kill some nontarget lepidopteran species if present and at a susceptible life stage. However, any affected native species are expected to recolonize the treated areas from nearby non-treated areas
- 3) No other nontarget organisms would be affected by *Btk*
- 4) No endangered, threatened, or sensitive species are in the treatment areas
- 5) No other effect to the human environment is known or anticipated.

This EA is consistent with Executive Order No. 12898, “Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations.” The implementation of this cooperative USDA-APHIS, USDA-FS, and the DATCP gypsy moth eradication project will not result in disproportionately high and adverse human health or environmental effects on any minority populations and low-income populations. As required by the Executive Order of the President, opportunities for full participation in the NEPA process by such populations have been provided.

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JoAnn M. Cruse

Date

State Plant Health Director

USDA-APHIS, Plant Protection and Quarantine

